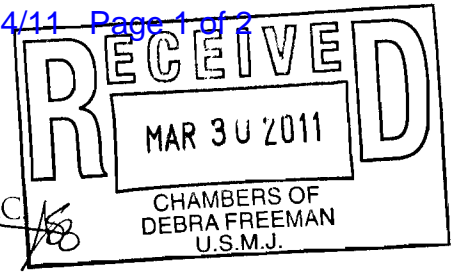


MEMO ENDORSED

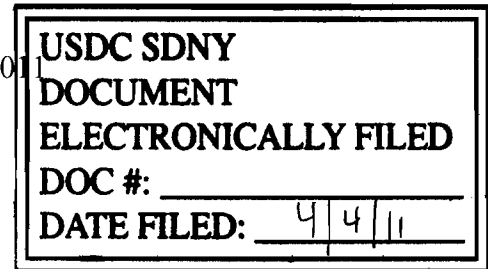
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RUSKIN MOSCOU FALTISCHEK P.C.
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March 29, 2011



By FedEx

Hon. Debra Freeman
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street – Courtroom 17A
New York, New York 10007

Re: *Singh v. Air India and Swissport USA, Inc.*, 10-CV-6532 (RMB)

Dear Magistrate Judge Freeman:

We represent defendant Air India in the above-referenced matter. As a follow-up to the telephone conference of March 18, 2011, and pursuant to Your Honor's request, we write on behalf of all parties to update the Court on several discovery matters.

Medical Records

We still have not received medical records directly from Drs. Yazdani and Raysen who apparently both practice at the Advanced Center for Psychotherapy in Queens. This, despite the fact that we sent proper authorizations well over 30 days ago. Contact with the representatives at the Center has resulted in inconsistent statements that the "records are in the mail." In addition, we received yesterday one additional authorization for a physician that was not previously identified.

Rule 35 Medical Examination

Plaintiff has consented to examination by defendants' psychiatric expert.

Depositions

Because we have not received plaintiff's medical records, we have been unable to schedule her deposition (in addition, until today, we were told plaintiff was available only on Tuesdays and Thursdays making scheduling more difficult). However, the parties have agreed to proceed with plaintiff's deposition on May 3, 2011 under the assumption we will have all records by that time. Dates for defendants' depositions have been offered in May. Although not scheduled, we expect that there will be no issue in that regard.



March 29, 2011
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MEMO ENDORSED

Mediation

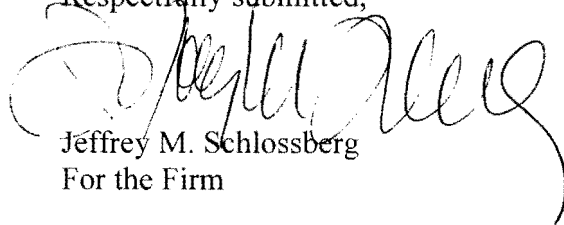
The case has been referred to mediation. Although a mediator appears to have been assigned as of March 14, we have not heard from the mediator or scheduled a mediation session.

Discovery Cut-off

The parties respectfully request that the discovery cut-off be extended an additional 30 days until June 3. As noted above, this short extension is necessitated by the difficulty we have had in obtaining the medical records and thus proceeding with plaintiff's deposition.

granted

Respectfully submitted,



Jeffrey M. Schlossberg
For the Firm

JMS:sbs

cc: Laurence J. Lebowitz, Esq. (by Email)
J. Gregory Lahr, Esq. (by Email)

#512529

SO ORDERED: DATE: 4/4/11

..... *Debra Freeman*

DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE